REMARKS/ARGUMENTS

Favorable reconsideration of this application, as presently amended and in light of the following discussion, is respectfully requested.

Claims 1-11 and 13-17 are pending in this application. Claims 1, 3, 7, 8 10 and 13 are amended and Claims 14-17 are added and Claim 12 is cancelled by the present response without introducing any new matter.

In the outstanding Office Action, Claims 1-6 and 13 were rejected under 35 U.S.C. §112, first paragraph, as failing to comply with the enabling requirement; and Claims 7-12 were rejected under 35 U.S.C. §102(b) as anticipated by Corcoron (Mapping Home-Network Appliances to TCP/IP Sockets Using a Three-Tiered Home Gateway Architecture).

With regard to the rejection of Claims 1-6 and 13 under 35 U.S.C. §112, first paragraph, as failing to comply with the enabling requirement, Applicants respectfully traverse this rejection.

In a non-limiting example of the present invention, Fig.3 shows several devices 5,6 that are connected to respective bus systems 7,8 which are connected to respective dumb gateways 3,4. These dumb gateways 3,4 are connected to a multimedia fiber-optic network optimized for automotive applications or a Media Oriented Systems Transport (MOST) network 2. Via a common network layer 300, these dumb gateways 3,4 connect to the MOST network 2 which connects to an intelligent gateway 1. Using this connection, the intelligent gateway logically replaces the dumb gateways 3,4 and controls the functionality and commands of the bus systems 7,8 and in turn the devices 5,6 connected to the bus systems 7,8.

For instance, in a further non-limiting example, Figure 4 illustrates bus service interfaces 31 and 41 that access all functionality and commands of the bus systems 8 and 7, respectively, via the common network layer 300 (e.g. UPnP over car bus 2). In other words,

the dumb gateway 4 is able to access the commands of the bus 7 through the bus service interface 41 that operates with the intelligent gateway 1 over the common network layer 300. The specification notes on page 14, lines 6-14 that a physical device such as 6 that is connected to a bus system 8 is able to communicate with physical devices such as 5 connected to another bus system 7 simply by addressing virtual device 42. However, when the data gets to virtual device 42 it is then routed through the bus service interface 41 over the common network layer 300 (e.g. over car bus 2) and to the intelligent gateway 1 which forwards the data onto dumb gateway 3 via the bus service interface 31.

The outstanding Action states

> The claim recites a dumb gateway device comprising: "a bus service interface configured to access all functionality and commands of said at least one bus system via said common network layer from an intelligent gateway connected to said common network layer." However, this is not supported by the specification. According to the specification, the bus service interface is configured to access all functionality and commands of another bus system, i.e. a bus system that is not directly connected to the bus service interface. The bus service interface for it's respective bus system accesses the functionality all functionality and commands directly, not via the common network layer (See Specification Page 14, Lines 6-14; "The physical devices connected to a respective bus system can then communicate with the physical devices connected to another bus system by simply addressing the corresponding virtual device").

In response, Claim 1 has been amended to recite "a bus service interface configured to provide access to all functionality and commands of said at least one bus system via said common network layer to an intelligent gateway connected to said common network layer." Accordingly, Applicants respectfully request that the rejection of Claims 1-6 and 13 under 35 U.S.C. §112, be withdrawn.

Addressing now the rejection of Claims 7-12 under 35 U.S.C. §102(b) as unpatentable over Corcoron, this rejection is respectfully traversed.

Amended Claim 7 recites,

> An intelligent gateway for communicating between gateway devices, which respectively connect to a respective bus system, that includes at least one physical device, <u>via</u> a common network layer, comprising:
>
> a static or dynamic possibility to provide at least one device presenter and/or at least one device emulator of at least one physical device to said common network layer; and
>
> <u>an isochronous stream handler adapted to be controlled by said device presenter or said device emulator.</u>

Newly added Claims 15 and 17 recite similar features with regard to the isochronous stream handler.

<u>Corcoron</u> describes a three-tier gateway architecture for internetworking between a home automation network and a TCP/IP based wide area network. However, <u>Corcoron</u> does not describe or suggest an isochronous stream handler adapted to be controlled by said device presenter or said device emulator. This feature is simply not described or suggest in this reference.

Accordingly, Applicants respectfully submit that Claim 7 and similarly Claims 15 and 17 patentably distinguish over <u>Corcoron</u> at least as this reference does not describe or suggest an isochronous stream handler.

Additionally, Claim 10 patentably distinguishes over <u>Corcoron</u>. Specifically, Claim 10 recites "a device presenter configured to present a real device on a bus system as a generic abstract device or service, wherein said generic abstract device or service presentation is a presentation according to the Universal Plug and Play protocol set."

The outstanding Action states on page 4 that page 733, section 3.3 of <u>Corcoron</u> describes a presentation according to the Universal Plug and Play protocol set, however Applicants respectfully traverse this assertion. Specifically, neither this section nor any other section of <u>Corcoron</u> ever mentions the Universal Plug and Play protocol set, which those skilled in the art know to be a unique protocol.

Accordingly, Applicants respectfully submit that Claim 10 patently distinguishes over Corcoron at least due to the fact that this reference does not describe or suggest the Universal Plug and Play protocol set recited in Claim 10.

Further, newly added Claims 14 and 16 also patentably distinguish over Corcoron. Specifically, Claim 14 recites "wherein said intelligent gateway and said gateway devices are connected by a non-IP based connection," and Claim 16 recites "wherein said first and second bus systems are not IP based."

As is shown in Figure 5 of Corcoron, the interface gateway is connected to the IP based wide area network. Thus, the connection between interface gateway, the application client and the home network interface unit is based on an IP connection. Thus, Corcoron clearly does not describe or suggest non-IP based connections, as is recited in Claims 14 and 16. Thus, Applicants respectfully submit that Claims 14 and 16 patently distinguish over Corcoron at least based on this feature.

Therefore, it is respectfully submitted that independent Claim 7 and new independent Claims 15 and 17 and claims depending therefrom, patentably distinguish over Corcoron.

Consequently, in view of the present amendment, no further issues are believed to be outstanding in the present application, and the present application is believed to be in condition for formal Allowance. A Notice of Allowance for Claims 1-11 and 13-17 is earnestly solicited.
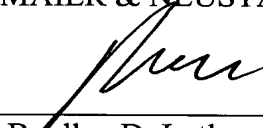
Respectfully submitted,

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